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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BARRY LYGA, an Individual,

Plaintiff,

vs.

WARNER BROS. TELEVISION., a Delaware corporation; FOX BROADCASTING COMPANY; a Delaware corporation; MAKENNA PRODUCTIONS, INC. formerly known as BERLANTI TELEVISION, INC., a California corporation; CHRIS FEDAK, an Individual; SAM SKLAVER, an Individual; SARAH SCHECTER, an Individual; and

DOES 1 through 100, inclusive,

Defendants.

**Case No.: 2:22-cv-06814
FLA(AGRx)**

**REQUEST TO ENTER
DEFAULT AS TO
DEFENDANTS WARNER
BROS. TELEVISION and
MAKENNA PRODUCTIONS,
INC formerly known as
BERLANTI TELEVISION, INC.;
DECLARATION OF GI NAM
LEE IN SUPPORT OF
REQUEST TO ENTER
DEFAULT**

1 **TO: THE CLERK OF THE ABOVE-ENTITLED COURT:**

2 Plaintiff BARRY LYGA hereby requests that the Clerk of the above-entitled
3 Court enter defaults in this matter against defendants WARNER BROS.
4 TELEVISION (“WB”), FOX BROADCASTING COMPANY (“Fox”), and
5 MAKENNNA PRODUCTIONS, INC. formerly known as BERLANTI
6 TELEVISION, INC. (“Makenna”) on the ground that said defendants have failed to
7 appear or otherwise respond to the Complaint within the time prescribed by the
Federal Rules of Civil Procedure.

8 Plaintiff served the Summons and Complaint on WB, Fox, and Makenna on
9 09/30/2022, as evidenced by the proofs of service of summons and complaint on
file with this Court. [**Dkts. 25 (Fox), 26 (WB), and 27 (Makenna)**].

10 The above stated facts are set forth in the accompanying declaration of Gi
11 Nam Lee , filed herewith.

13 **DATED:** December 20, 2022

14 BY: /s/ Gi Nam Lee
15 Gi Nam Lee
16 Attorneys for Plaintiff

DECLARATION OF GI NAM LEE
Case No.: 2:22-cv-06814 FLA(AGRx)

I, Gi Nam Lee, declare as follows:

1. I am Of Counsel to Vox Trial Attorneys, PC, the attorney of record for Plaintiff BARRY LYGA in the above-captioned action. This declaration is made in support of Plaintiff's Request for Entry of Default.

2. The following facts are of my own personal knowledge unless otherwise indicated and if called to testify, I would and could competently testify thereto.

3. Defendants Warner Bros. Television (“WB”), Fox Broadcasting Company (“Fox”) and Makennna Productions, Inc. formerly known as Berlanti Television, Inc. (“Makenna”) have been served with the summons and complaint, as evidenced by the proofs of service of summons and complaint. [Dkts. 25 (Fox), 26 (WB), and 27 (Makenna)].

4. The time allowed by law for responding (10/21/2022) has expired.

5. WB, Fox. and Makenna have failed to file a pleading or motion permitted by law.

6. WB, Fox, and Makenna are neither minors nor incompetent persons.

I declared under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: 12/20/2022

By: /s/ Gi Nam Lee

Gi Nam Lee

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
 ss.
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 3600 Wilshire Blvd., Suite 1510 Los Angeles, CA 90010. On 12/08/2022, I served the foregoing documents described as:

REQUEST TO ENTER DEFAULT AS TO DEFENDANTS WARNER BROS. TELEVISION, FOX BROADCASTING COMPANY, AND MAKENNNA PRODUCTIONS, INC. formerly known as BERLANTI TELEVISION, INC; DECLARATION OF GI NAM LEE IN SUPPORT OF REQUEST TO ENTER DEFAULT

on the interested parties in this action by the below marked methods and addressed as follows:

Warner Bros Television c/o CT Corporation System 330 N. Brand Street Suite 700 Glendale, CA. 91203	Fox Broadcasting Company c/o CT Corporation System 330 N. Brand Street Suite 700 Glendale, CA. 91203	Makenna Productions, Inc. formerly known as Berlanti Television, Inc. c/o CT Corporation System 330 N. Brand Street Suite 700 Glendale, CA. 91203
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[X] By US Mail: I enclosed the documents in a sealed envelope or package addressed to the person at the addresses above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 12/20/2022

/S/ GI NAM LEE